



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500  
DENVER, COLORADO 80202-2466

REF: EPR -EP

May 27, 1997

Michael Sieg  
U.S. Forest Service  
Ashley, Uinta, Wasatch-Cache  
6944 South 3000 East  
Salt Lake City, UT 84121

RE: Final Environmental Impact Statement  
(FEIS) - Alta Ski Area Expansion

Dear Mr. Sieg:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and section 309 of the Clean Air Act (CAA), the Region VIII office of the Environmental Protection Agency (EPA) has reviewed the FEIS for the above referenced project.

We appreciate the U. S. Forest Service (USFS) considering our comments on the Draft Environmental Impact Statement (DEIS) and incorporating most of these into the FEIS. We still have a remaining concern regarding wetlands and a suggestion regarding air quality as stated below:

Wetlands/Water Quality:

We remain concerned regarding the practice of wetland usage for snow storage. Because snow from parking areas contain hydrocarbons and other solids (i.e. sand, salt and trash) it should be considered a discharge of pollutants under the Clean Water Act, §301 (a). Therefore dumping snow in waters of the U.S. , including wetlands, would require a permit. Depending on the nature of the discharge a permit would be issued under the Clean Water Act § 402, National Pollutant Discharge Elimination System (NPDES) or under §404, Wetlands Protection. Also, pursuant to the "Protection of Wetlands: Executive Order 11990" the USFS is required to avoid any impacts to wetlands. We encourage the USFS to select a more appropriate location for disposal of this snow, for example an upland meadow area.

Air Quality:

The use of the CALINE4 model for modeling line sources in the Alta situation is inappropriate. The EPA Guideline model for line sources is CALINE3. Although CALINE4

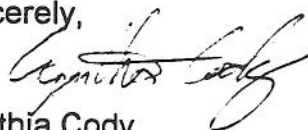


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was used, the predicted concentrations were well below the NAAQS and the use of CALINE3 would probably not have resulted in a significant difference. Also, without EPA having an opportunity for review or input on the selected modeling parameters and protocol, it is difficult for us to do a complete review. We would appreciate having this opportunity in the future, particularly during the upcoming EIS analysis for the Snowbird, Solitude and Brighton Ski Areas. The remaining modeling issues we raised in our review of the DEIS have been addressed in the FEIS.

Thank you for the opportunity to comment. If you have any questions please contact me at (303) 312-6228.

Sincerely,



Cynthia Cody  
Ski Area NEPA Coordinator  
Ecosystem Protection Program

cc: Brooks Carter, COE, Utah Regulatory Office  
Russell Roberts, UT DEQ, Division of Air Quality  
Don Ostler, UT DEQ, Division of Water Quality

